

KELLEY DRYE & WARREN LLP

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Attorneys for Defendant Sunrun Inc.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

PEGGY BANKS, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SUNRUN INC.

Defendant.

Case No. 4:24-cv-07877-JST

**DECLARATION OF GLENN T.
GRAHAM IN SUPPORT OF
STIPULATION AND [PROPOSED]
PROTECTIVE ORDER**

Hon. Jon S. Tigar

CASE NO. 4:24-CV-07877-JST

DECLARATION OF GLENN T. GRAHAM IN SUPPORT OF STIPULATED PROTECTIVE
ORDER

1 I, Glenn T. Graham, declare as follows:

2 1. I am an attorney authorized to practice law in the States of New Jersey, New York,
3 and California. I am a partner with the law firm of Kelley Drye & Warren LLP and counsel of
4 record for Defendant Sunrun Inc. in this matter. I make this declaration in support of the Stipulated
5 Protective Order. I have personal knowledge of the facts set forth herein, and if called upon to do
6 so, I could competently testify thereto.

7 2. The Stipulated Protective Order concurrently filed hereto is nearly identical to the
8 Model Order for the Northern District of California, located at
9 <https://cand.uscourts.gov/forms/model-protective-orders/>, except for the addition of case-
10 identifying information and the addition of language to Section 11, titled "Inadvertent Production
11 of Privileged or Otherwise Protected Material."

12 3. Section 11 includes stipulated language regarding the effect of a disclosure of
13 communication or information covered by the attorney-client or work product privilege.

14 4. A redline comparing the model order for the Northern District of California to the
15 parties' Stipulated Protective Order is attached hereto as **Exhibit A**.

16 I declare under penalty of perjury that the foregoing is true and correct.

17
18 Dated this 25th of July, 2025

KELLEY DRYE & WARREN LLP

19 By: /s/ Glenn T. Graham

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